

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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MEGAN VILLELLA, Individually and on	:	Civil Action No. 1:15-cv-02106-ER-GWG
Behalf of All Others Similarly Situated,	:	(Consolidated)
	:	
Plaintiff,	:	<u>CLASS ACTION</u>
	:	
vs.	:	JOINT STIPULATION AND PROPOSED
	:	SCHEDULING ORDER GOVERNING
CHEMICAL AND MINING COMPANY OF	:	SUMMARY JUDGMENT MOTIONS AND
CHILE INC., et al.,	:	DAUBERT MOTIONS
	:	
Defendants.	:	
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WHEREAS, on March 11, 2020, the parties filed a joint stipulation and proposed schedule governing briefing on summary judgment and accompanying *Daubert* motions;

WHEREAS, on March 11, 2020, the Court so ordered the joint stipulation and proposed scheduling order under which the parties asked the Court to waive its pre-motion letter and conference requirements set forth in Section 2.A.ii of the Court's Individual Rules of Practice;

WHEREAS, the parties' counsel have experienced administrative disruptions caused by efforts to prevent the spread of the COVID-19, and expect such disruptions to continue to affect the parties' ability to efficiently perform aspects of their anticipated filings;

WHEREAS, in light of the preceding, the parties have conferred and agreed, pending the Court's approval, to extend by three weeks the deadlines in the March 11, 2020 scheduling order governing briefing on summary judgment and accompanying *Daubert* motions as set forth below;

Accordingly, IT IS HEREBY STIPULATED AND AGREED by the parties, through their undersigned counsel, subject to Court approval, as follows:

EVENT	DEADLINE
Motions for Summary Judgment and Accompanying <i>Daubert</i> Motions	April 16, 2020
Oppositions to Motions for Summary Judgment and Accompanying <i>Daubert</i> Motions	June 19, 2020
Replies in Support of Motions for Summary Judgment and Accompanying <i>Daubert</i> Motions	August 3, 2020

The pre-motion letter and conference requirements set forth in Section 2.A.ii of the Court's Individual Rules of Practice are hereby waived regarding the parties' *Daubert* and summary judgment motions.

Each party reserves the right to seek an extension of the above deadlines.

Dated: March 20, 2020

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By: /s/ Matthew S. Melamed
MATTHEW S. MELAMED

By: /s/ Grant R. Mainland
GRANT R. MAINLAND

SO ORDERED.

DATED: March 20, 2020



HONORABLE EDGARDO RAMOS
UNITED STATES DISTRICT JUDGE